

October 31, 2002

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Dear Ms. Dortch:

**Re: Ex Parte Notice
MB Docket Nos. 02-277, 01-235, 01-317, 00-244
In the Matter of 2002 Biennial Regulatory Review – Review of the
Commission’s Broadcast Ownership Rules and Other Rules Adopted
Pursuant to Section 202 of the Telecommunications Act of 1996,
Cross-Ownership of Broadcast Stations and Newspapers, Rules and
Policies Concerning Multiple Ownership of Radio Broadcast Stations
in Local Markets, Definition of Radio Markets**

Today, the Communications Workers of America sent the attached letter to Chairman Michael K. Powell urging the Commission to hold public field hearings in its media ownership proceeding. Because the issue of media ownership is so critical to our democracy, CWA encouraged the Commission to hold field hearings to solicit as broad a range of viewpoints as possible in this proceeding.

Sincerely,

Debbie Goldman
Research Economist

Attachment

October 31, 2002

The Honorable Michael K. Powell
Chairman
Federal Communications Commission
445 Twelfth St., S.W.
Washington, D.C. 20554

Dear Chairman Powell:

**Re: MB Docket Nos. 02-277, 01-235, 01-317, 00-244
In the Matter of 2002 Biennial Regulatory Review – Review of the
Commission’s Broadcast Ownership Rules and Other Rules Adopted
Pursuant to Section 202 of the Telecommunications Act of 1996,
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The Commission’s sweeping review of its broadcast ownership rules may well become the most important legacy of this Commission under your leadership. By setting the rules for media ownership and, therefore, the industry structure within which Americans receive news, information and entertainment, this review will shape the future of American democracy and the social and economic well-being of our society.

It is imperative, therefore, that the Commission develop as full and complete a record from as wide an array of interested parties as possible in this proceeding.

To assist the Commission in developing a full and complete record, we strongly encourage the Commission to hold public hearings in diverse locations across the United States. These hearings will provide the Commission the opportunity to hear first-hand from individuals and organizations who have a tremendous stake in the outcome of this rulemaking, but who may not have the resources or opportunity to submit formal comments.

There is strong precedent for this proposal. In the initial 706 proceeding, a federal-state Joint Board held field hearings across the country to gather information on the deployment of advanced services in local communities. These hearings provided consumers, businesses, non-profit organizations, and local policymakers the opportunity to describe local market conditions and real-life implications of policy options. Similarly, in recent merger reviews, the Commission has held public hearings to supplement formal comments.

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The Communications Workers of America (CWA) represents more than 730,000 employees, of whom more than 60,000 work in the newspaper and broadcasting industries – journalists, technicians, advertising sales personnel, printers, mailers, and others. As professionals working on the frontlines of the media industry, they know how media ownership affects their ability to report and distribute diverse and high-quality news, information and entertainment. We are convinced that hearing their stories directly—alongside the direct testimony of other interested parties--will make an important contribution to the record in this proceeding.

CWA, working with the AFL-CIO, will submit formal comments in this proceeding, just as we did (through the AFL-CIO) in the Newspaper/Broadcast Cross-Ownership proceeding. But the issue of media ownership and its market structure is far too important to leave to formal comments alone. Therefore, we hope that you take up the suggestion to convene field hearings as an important complement to the formal comment process.

Thank you for your consideration. We look forward to further opportunities to weigh in on these issues.

Sincerely,

Morton Bahr
President

Linda Foley
Vice President, TNG-CWA

John Clark
Vice President, NABET-CWA

William J. Boarman
Vice President, PPMWS

cc: Commissioner Michael J. Copps
Commissioner Kathleen Q. Abernathy
Commissioner Kevin J. Martin